

# WILDLIFE CORRIDOR CONSERVATION AUTHORITY

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March 1, 2006

Dr. Randy Howard, Executive Director  
Planning and Development  
Rio Hondo College  
3600 Workman Mill Road  
Whittier, California 90601

## **Comments on the Draft Master Environmental Impact Report for the Rio Hondo College Master Plan**

Dear Mr. Howard:

The Wildlife Corridor Conservation Authority (WCCA) was established to provide for the proper planning, conservation, environmental protection, and maintenance of lands within the Puente-Chino Hills wildlife corridor area. WCCA's goal is to assure that sufficient continuity of habitat can be preserved to maintain a functioning wildlife corridor made up of about 40,000 acres of land located between the Santa Ana Mountains and Whittier Hills. This wildlife corridor is the last major natural open space resource connecting Los Angeles, Orange, San Bernardino, and Riverside Counties. It provides essential relief for people and animals from the urban environment, and it exists as a single ecosystem in which changes that affect one part may also affect all other parts.

WCCA has reviewed the Draft Master Environmental Impact Report (DMEIR) for the Rio Hondo College Master Plan. WCCA supports the comments provided by Puente Hills Landfill Native Habitat Preservation Authority (Habitat Authority) in a February 23, 2006 letter to the College. WCCA provides the following additional comments. WCCA requests that the College fully address the comments provided by the Habitat Authority and by WCCA.

### **Need to Address the Regional Significance of the Puente-Chino Hills Wildlife Corridor**

The DMEIR is deficient for failing to mention the Puente-Chino Hills wildlife corridor in the Biological Resources Chapter (see Regional Setting, p. 3.3-2; wildlife movement and Regional Biological Value of the Site, pp. 3.3-18 through 3.3-20). The Puente-Chino Hills wildlife corridor is a 31-mile long area of natural lands that remain as open space and are still connected. It stretches from the Whittier Narrows area near the 605 and 60 freeways all the way to the Cleveland National Forest in Orange County south of the 91 freeway. The subject site is located at the western end of the wildlife corridor. The site supports native habitats and native

wildlife using this corridor such as coyote and deer. The site may also function as a movement corridor for species such as birds.

Although the site may be disturbed due to the existing developed campus onsite, WCCA concurs with the DMEIR (p. 3.3-10) stating: "...the mosaic of vegetation communities that do exist on the project site and within the adjoining areas constitute a functional ecosystem for a variety of wildlife species." The Final Environmental Impact Report (FEIR) must address the regional significance of the Puente-Chino Hills wildlife corridor and the contribution of the site to the wildlife corridor.

### **Need for Clear Representation of Impacts to Biological Resources**

The DMEIR presents inconsistencies regarding impacts to biological resources. The DMEIR (p. 3.3-26) states that the proposed project would result in the direct removal of 4.86 acres of non-sensitive plant communities and 2.25 acres of coastal sage scrub. Later in the DMEIR (p. 3.3-29), the estimate is 2.8 acres of native vegetation and 4.8 acres of disturbed/ornamental. The FEIR must accurately and consistently represent the quantitative impact to each of the native plant communities. The FEIR must present a table including the existing acres of each plant community onsite (including existing acres offsite, where they will be disturbed), and the acres of each plant community to be disturbed (both onsite and offsite). This is basic information that must be included in the FEIR.

Furthermore, a comparison of the roads, topography, vegetation mapping, and proposed disturbance area of the various figures leads to a confusing picture of where those impacts would occur. In fact, it is unclear whether the impact area for the North Entry Road Disturbance Area (Figure 3.3.1-1) was mapped for vegetation types (compare Figures 3.3.1-1, 2.4-1, 3.3.1.1-1, and 3.3.1.1-2). The figures showing the extent of impacts to plant communities must be crystal clear to the reviewer, in order to comply with one of the intents of the California Environmental Quality Act (CEQA), that is, to document environmental impacts, and provide this information to the public for review. The FEIR must include a map showing the existing vegetation communities, and the same map at the same scale with the impact areas overlain on the vegetation communities. The boundaries of impact Area I and Area II (referenced on p. 3.3-29) must be shown on this map. This is most effectively depicted on a recent aerial photo or topographic map.

The FEIR must also include a map showing the location of drainages onsite, and the estimated extent (i.e., square feet) of impacts to drainages from the project. The DMEIR is lacking in its treatment of drainages because it states "there is seasonally available water onsite within the drainage channels" (p. 3.3-17), but there is no map or statement about the existing acreage of drainages onsite. Mitigation measure 6 (p. 3.3-31) requiring permits for unanticipated construction activity within jurisdictional drainages on the project site is

deficient. The FEIR should document the anticipated impacts to drainages and propose avoidance and clearly-defined mitigation measures.

### **Need to Address Impacts to Coastal California Gnatcatcher and Coastal Sage Scrub**

The DMEIR is deficient for failing to mention the potential for the coastal California gnatcatcher to occur onsite. As the Habitat Authority points out, this bird, listed as Threatened by the U.S. Fish and Wildlife Service, is known to occur south and west of the site. It may use the site for dispersal, even if the coastal sage scrub onsite is disturbed. Focused gnatcatcher surveys in accordance with U.S. Fish and Wildlife Service protocols should be performed onsite in the anticipated impact areas and those results should be included in the FEIR.

WCCA disagrees with the assertion that impacts to coastal sage scrub would be considered a less than significant impact. This plant community is considered Very Threatened by California Department of Fish and Game, and it has been estimated that about 80-90 percent of this plant community has been lost. Coastal sage scrub supports a suite of sensitive wildlife species. Furthermore, Figure 3.3.1.1-2 appears to show that the impact area is within a Significant Ecological Area. The FEIR should present a project with additional avoidance to coastal sage scrub. In addition, specific mitigation must be required in the FEIR to offset impacts to this plant community. The following text should be added to mitigation measure 3 (p. 3.3-31):

Any impacts to coastal sage scrub will be mitigated by restoration of, or protection of existing, coastal sage scrub at a ratio of two acres for each acre impacted. Restored areas will be permanently protected by fee title conveyance to a natural resources management agency, or via a conservation easement granted to a natural resources management agency such as Puente Hills Landfill Native Habitat Preservation Authority (Habitat Authority) or Wildlife Corridor Conservation Authority. Alternately, funding may be provided to the Habitat Authority to purchase two acres of coastal sage scrub habitat for every acre to be impacted.

The Habitat Authority and WCCA have the local experience and ability to acquire and manage open space lands. Agencies such as these could provide the greatest assurance that any mitigation lands would be protected in perpetuity.

### **Need for Focused Plant Surveys**

Conducting focused plant surveys is not adequate mitigation. One of the purposes of a CEQA document such as an Environmental Impact Report is to document the presence sensitive environmental resources (such as rare plants), and to analyze alternatives to

avoid significant adverse impacts to sensitive environmental resources. The FEIR should include the results of those focused surveys, and project modifications to avoid impacts. If the College chooses to wait to conduct surveys until after the FEIR is completed, then the College should postpone implementation of the project until those surveys are completed. An additional DEIR should be prepared if any additional rare plants are found and will be impacted.

### **Need for Discussion of Impacts to Recreation**

The FEIR must address whether the project will impact the Schabarum Trail, and if so, what would be done to avoid any impacts.

Thank you for your consideration of these comments. Please supply WCCA with a copy of the FEIR, or a notification that the FEIR is available on the web, when the FEIR is available. If you have any questions, please contact Judi Tamasi of our staff at (310) 589-3200, ext. 121.

Sincerely,

Bob Henderson  
Chairperson